

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : INDICTMENT
- v. - : S1 08 Cr. 86 (MGC)
JASON C. NEAL, :
Defendant. :

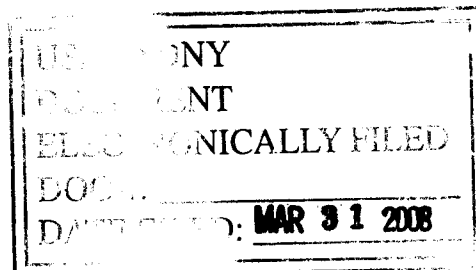
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COUNT ONE

The Grand Jury charges:

1. From in or about July 2007, up to and including in or about January 2008, in the Southern District of New York and elsewhere, JASON C. NEAL, the defendant, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JASON C. NEAL, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, 5 kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Sections 812, 841(a)(1), and 841(b)(1)(A) of Title 21, United States Code.



Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about January 2008, in the vicinity of Green River, Utah, two co-conspirators not named as defendants herein ("CC-1" and "CC-2"), drove a 1999 Chevrolet van with Vehicle Identification Number 1GBFG15WOX1078781 ("the Van"), which contained 6.7 kilograms of cocaine and two semi-automatic handguns that were hidden in a secret compartment in the Van.

b. On or about January 14, 2008, JASON C. NEAL, the defendant, got into the Van in the vicinity of East Tremont Avenue and White Plains Road, Bronx, New York, with CC-1 and CC-2.

(Title 21, United States Code, Section 846.)

COUNT TWO

The Grand Jury further charges:

4. On or about January 14, 2008, in the Southern District of New York, JASON C. NEAL, the defendant, and others known and unknown, unlawfully, intentionally, and knowingly did distribute and possess with intent to distribute a controlled substance, to wit, less than 50 kilograms of mixtures and

substances containing a detectable amount of marijuana.

(Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(D); Title 18, United States Code, Section 2.)

COUNT THREE

The Grand Jury further charges:

5. On or about January 14, 2008, in the Southern District of New York, JASON C. NEAL, the defendant, unlawfully, willfully, and knowingly, during and in relation to drug trafficking crimes for which he may be prosecuted in a court of the United States, namely, the violations of the narcotics laws charged in Counts One and Two of this Indictment, did use and carry a firearm, and in furtherance of such crime, did possess a firearm, to wit, a Desert Eagle .357 caliber semi-automatic handgun.

(Title 18, United States Code, Section 924(c)(1)(A)(i).)

FORFEITURE ALLEGATION

6. As a result of committing the controlled substance offenses alleged in Counts One and Two of this Indictment, JASON C. NEAL, the defendant, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds NEAL obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts One and Two of this Indictment, including but not limited to, the

following: (a) a sum of money representing the amount of proceeds obtained as the result of the offense, conspiracy to distribute a controlled substance; (b) all right, title and interest of NEAL in two vehicles: one 1999 Chevrolet van with Vehicle Identification Number 1GBFG15WOX1078781, and one 2004 Ford Explorer XLT with Vehicle Identification Number 1FMDU73E54ZA99028; (c) all right, title and interest of NEAL in three handguns: one .40 caliber Smith & Wesson handgun, serial number PDD9332, one .50 caliber IMI Desert Eagle handgun, serial number 32201639, one .357 caliber IMI Desert Eagle handgun, serial number 19646-S; and (d) all right, title and interest of NEAL in one suit of body armor.

Substitute Assets Provision

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;

(c) has been placed beyond the jurisdiction of the Court;

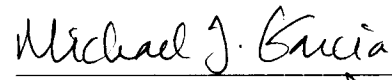
(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1) and 853.)


FOREPERSON


MICHAEL J. GARCIA *SWR*
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JASON C. NEAL,

Defendant.

INDICTMENT

S1 08 Cr. 86 (MGC)

(21 U.S.C. §§ 812, 841(a)(1),
841(b)(1)(A), 841(b)(1)(D), 846;
18 U.S.C. §§ 924(c)(1)(A), 2.)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL



Foreperson.
